

AO 91 (Rev. 11/11) Criminal Complaint

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Special Agent: Christopher Hudson, HSITelephone: (313) 226-9717  
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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Fabian Andres PLATA OCAMPO

Case:2:19-mj-30652  
Judge: Unassigned,  
Filed: 12-13-2019 At 12:27 PM  
USA V PLATA OCAMPO (CMP)(CMC)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 19, 2019 in the county of Wayne in the  
Eastern District of Michigan - SD, the defendant(s) violated:*Code Section*

Title 31, United States Code, Section 5332.

*Offense Description*

Bulk Cash Smuggling.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.*Complainant's signature*Christopher Hudson, Special Agent, HSI*Printed name and title*

Sworn to before me and signed in my presence.

Date: December 12, 2019City and state: Detroit, Michigan*Judge's signature*Honorable R. Steven Whalen, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Christopher Hudson, Special Agent of Homeland Security Investigations (HSI), Detroit, Michigan, United States Department of Homeland Security, being duly sworn deposes and states:

**I. INTRODUCTION**

1. I have been employed as a Special Agent with HSI since March of 2003. I have received basic training at the Federal Law Enforcement Training Center located in Glynco, Georgia. I am currently assigned to the HSI Guns and Gangs group. During my career, I have been involved in numerous investigations of federal currency violations. Prior to this assignment, I was a certified police officer in the State of Michigan from 2001 to 2003.

2. The facts in this affidavit come from my personal observations, my training and experience, and from information obtained from other law enforcement officers. This affidavit is intended to demonstrate that there is sufficient probable cause for this complaint and does not set forth all information known to law enforcement related to this investigation.

3. This affidavit is provided in support of a complaint and arrest warrant for Fabian Andres PLATA OCAMPO, DOB: XX/XX/1984. Probable cause exists that PLATA OCAMPO violated Title 31 U.S.C. 5332, Bulk Cash Smuggling.

## **II. PROBABLE CAUSE & INVESTIGATION**

4. On October 19, 2019, at approximately 7:00 pm, PLATA OCAMPO, Citizen of Columbia, arrived at the Detroit Ambassador Bridge Port of Entry. PLATA OCAMPO was driving a rental vehicle with Georgia license plate number CJV 5387. PLATA OCAMPO was the sole occupant in the vehicle. PLATA OCAMPO stated to Customs & Border Protection Officer (CBPO) Langmeyer that he was lost and did not intend to go to Canada. CBPO Langmeyer received a negative declaration from PLATA OCAMPO. PLATA OCAMPO presented a Columbian passport to CBPO Langmeyer for identification. Records checks indicated that PLATA OCAMPO had overstayed his Visa and was currently out of status and deemed removeable from the United States. CBPO Langmeyer explained the currency reporting requirements to PLATA OCAMPO and asked how much currency PLATA OCAMPO was in possession of. PLATA OCAMPO stated that he was in possession of \$10,000 in US currency. CBPO Langmeyer referred PLATA OCAMPO and the vehicle for secondary inspection.

5. During secondary inspection, CBPO's Howe and Rabaut verified that PLATA OCAMPO was in possession of \$10,853 in US currency. Customs Enforcement Officer (CEO) Itani and his K-9 partner "Codi" conducted a search of the rental vehicle operated by PLATA OCAMPO. "Codi" indicated a positive alert to the vehicle, specifically the dashboard of the vehicle. Upon further physical

inspection of the vehicle by CBPO's Shinn, Singh and CEO Itani, Officers located several bundles of US currency hidden in the dashboard and several bags located in the vehicle. The total amount of US currency found in the vehicle and on PLATA OCAMPO's person was \$178,427. Also located inside the vehicle were several bank transaction receipts from different accounts and bank branch locations. CBPO's also located a fraudulent Mexican drivers license with PLATA OCAMPO's picture on it under the name of Andres Felipe Medina Montoya. Rental paperwork inside of the vehicle indicated that PLATA OCAMPO rented the vehicle from Chicago, IL. using the fraudulent Mexican drivers license. PLATA OCAMPO was detained and placed in a holding cell.

6. On October 19, 2019, at approximately 10:52 pm Homeland Security Investigations (HSI), Special Agent (SA) Christopher Hudson conducted an interview of PLATA OCAMPO. Prior to the interview, PLATA OCAMPO was advised of and waived his Miranda rights. The rights were given to PLATA OCAMPO in the Spanish Language. PALTA OCAMPO signed the HSI rights form. The following is a non-verbatim synopsis of the interview:

- a. PLATA OCAMPO has been doing money pickups for approximately 4 months.

b. PLATA OCAMPO has done approximately 5 money pickups, but only in the Los Angeles, CA. area. This is his first time picking up money outside of Los Angeles, CA.

c. PLATA OCAMPO was provided a cellular telephone by an individual he did not know. PLATA OCAMPO receives instructions via text messages and phone calls on when and where to do money pickups.

d. On this particular occasion, PLATA OCAMPO flew from Los Angeles, CA. to Chicago, IL., rented a vehicle and drove to Columbus, OH. In Columbus, OH. he picked up the money from an unknown individual.

e. PLATA OCAMPO was sightseeing in Detroit when he ultimately got lost and ended up in the Port of Entry.

f. PLATA OCAMPO knew that what he was doing was probably illegal, but he was doing the money pickups to pay off a debt that he owed in Columbia stemming from a real estate deal.

g. PLATA OCAMPO expressed concern for his family back home in Columbia.

7. Analysis of the bank receipts located inside of the rental vehicle revealed that from 10/17/2019 through 10/19/2019 a total of 22 bank transactions took place from different bank accounts and bank branches in Illinois, Indiana, and Ohio with a total amount of \$194, 740 in US currency.

8. Affiant reviewed a video filmed by PLATA-OCAMPO as he was pending inspection at the Detroit Port of Entry on the Ambassador Bridge on October 19, 2019, shortly before inspection. PLATA-OCAMPO is observed stuffing money into bags in the video. In addition, PLATA-OCAMP is narrating the video and states the following in the Spanish language, ““This is the line. I passed it, so I had to turn around. This is the line and I am entering the United States again. Just so you know how it is. I cannot return because there are cars there and there. I cannot return. I put—well, I put here... Honesty, I have small denomination bills. I spent the large ones. I am going to look, I am going to pass/enter. I am not going to say anything yet. Let’s wait and see- - I cannot return now. I must enter with my passport and visa. I am in an American car, so God forbid something happens to me (God willing nothing happens to me...). Look, this is the line.” Affiant confirmed the video was sent by text message to an unknown receiver.

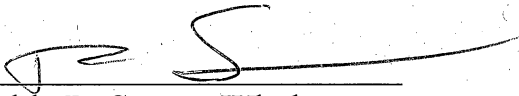
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9. Based on the foregoing, probable cause exists that Fabian Andres PLATA OCAMPO did knowingly and intentionally violate Title 31 U.S.C. 5332, Bulk Cash Smuggling.



Christopher Hudson  
Special Agent  
Homeland Security Investigations

Sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable R. Steven Whalen  
United States Magistrate Judge

Dated:

**DEC 13 2019**